

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Kaye Cornell

Case: 2:14-mj-30457
Judge: Unassigned,
Filed: 09-05-2014 At 12:33 PM
USA v. Kaye Cornell(CMP)(MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 2009 - September 2012 in the county of Oakland in the
Eastern District of Michigan, the defendant(s) violated:*Code Section*

18 USC Section 656

Offense Description

Theft, embezzlement, or misapplication by bank officer or employee.

This criminal complaint is based on these facts:

See attached.

☒ Continued on the attached sheet.*Complainant's signature*

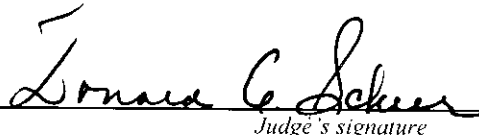
Sean Callaghan, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: Sept. 5, 2014

City and state: _____

*Judge's signature**Printed name and title*

AFFIDAVIT


Sean Callaghan, being duly sworn, states as follows:

I am a Special Agent with the Federal Bureau of Investigation (FBI) and have investigated a variety of violations, including financial crimes, as an FBI agent for approximately 11 years.

1. The information contained in this affidavit is based on my personal knowledge and observations during the course of this investigation, financial reports that I have reviewed, and documents and information provided to me by individuals interviewed by myself and other Special Agents in reference to this investigation. Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation. Rather, I have set forth only the facts that I believe are necessary to establish probable cause to believe that Kaye Cornell, being an employee of an insured bank, embezzled moneys of such bank, in violation of Title 18 USC Section 656.
2. In January 2013, representatives from Affinity Group Credit Union advised that the head teller at their branch located in Pontiac, Michigan, Kaye Cornell, was placed on administrative leave when it was discovered that the vault under her control was out of balance in the amount of \$317,000.00. A review of bank records dating back to 2006, revealed that Cornell was conducting two transactions every month to cover up the missing money. Cornell would place the missing amount into Miscellaneous Currency. Cornell would run a debit transaction to make it appear that she sold the currency to the corporate office. This should have been followed by a shipment of that amount to the corporate office, however, Cornell would reverse the transaction by running a credit in that amount. This would make it appear that the cash counts were in balance during monthly audits.
3. Investigators from Affinity Group Credit Union reviewed Cornell's personal account statements from her credit union account. This review revealed that between 2007 and November Of 2012, a total of \$164,245.54 cash deposits were made into that account. These cash deposits were over and above the automatic payroll deposits for Cornell and her husband.
4. During an interview conducted by the FBI, Cornell advised that she took money from her teller drawer for her own benefit from approximately 2009 until shortly before the termination of her employment in September of 2012. Cornell said she took as little as \$20.00 and as much as \$1,000.00 at one time in order to pay her bills. Cornell stated that she did not keep track of the total amount that she took. According to Cornell, when she took money, she would falsely increase a denomination in her drawer. Cornell would then inflate the amount in the Miscellaneous Currency account to offset the amount she had taken.

Cornell estimated that she had taken about \$87,000.00 or \$88,000.00. Cornell said that she last took money from her drawer in September 2012, she took approximately \$1,000.00, deposited it in her credit union account, and used it to pay bills.

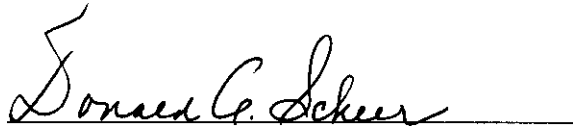
5. Based on the foregoing, there is probable cause to believe that Kaye Cornell being an employee of an insured bank, embezzled moneys of such bank, in violation of Title 18 USC Section 656.

A handwritten signature in black ink, appearing to read 'S. Callaghan', written over a horizontal line.

Sean Callaghan, Special Agent
Federal Bureau of Investigation

Sworn to and subscribed to before

Me this day 5th of September, 2014

A handwritten signature in black ink, appearing to read 'Donald G. Scheer', written over a horizontal line.

United States Magistrate Judge